



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

100452

HAND DELIVERED

October 12, 1993

Anne Hiller
DNREC
715 Grantham Lane
New Castle, DE 19720

RE: Feasibility Study and Draft Feasibility Study Addendum for
Standard Chlorine of Delaware

Dear Ms. Hiller:

EPA has reviewed the Final Feasibility Study dated May 1993 and the Draft Feasibility Study Addendum dated September 1993 for the Standard Chlorine of Delaware Site. EPA finds the reports to contain sufficient information to make a recommendation on the preferred alternative for remediation. Therefore, EPA recommends that DNREC approve these FS reports with the observation that EPA may not necessarily agree with all of the information contained in the reports.

Comments on the Final Feasibility Study are attached to this letter. Comments on the draft Feasibility Study Addendum will be forwarded to you shortly. To address the uncertainties and/or disagreements, these comments will be incorporated into the Administrative Record for the Standard Chlorine of Delaware Site, prior to issuing the Proposed Plan. In this manner, EPA and DNREC can move forward in the Superfund process to reach a final decision on the appropriate remedial measures for the site.

If you have any questions on the enclosed material, I can be reached at (215) 597-0910.

Sincerely,

Katherine A. Lose
Katherine A. Lose
Remedial Project Manager
DE/MD Section

Enclosures

cc: B. Pasquini, EPA
B. Davis, EPA
D. Ioven, EPA
D. Spencer, Versar

AR308337

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Standard Chlorine of Delaware
FS Review

DATE: 10-7-93

FROM: Kate Lose (3HW42)
DE/MD Section *KL*

TO: Anne Hiller
DNREC

I have reviewed the Final Feasibility Study Report for Standard Chlorine of Delaware, Inc, dated May 1993. Although, the report provides sufficient information to make a recommendation for remedial measures at the site, I have a few specific comments which I feel should be entered as part of the record. My comments are as follows:

1. Page ES-8 of the report recommends a specific alternative. This is inappropriate at a site where the PRP conducts the RI/FS. Another mechanism, such as a memorandum could be utilized to communicate this information.
2. Page 1-4 states that recovered ground water goes to the on-site wastewater treatment plant. It is EPA's understanding, that recovered ground water is first conveyed to the on-site air stripper, where the off-gases are conveyed to the boilers, prior to the recovered water going to the wastewater treatment system.
3. Page 4-17 states that "proper materials handling procedures, such as those employed during the emergency response efforts of 1986, will be employed.. " Standard Chlorine should be aware that any work conducted in the RD/RA will require the submission and acceptance of a detailed Health and Safety Plan to monitor and protect the workers.
4. Surface water in the Sedimentation Basin is not discussed in detail. I have inferred that the water in the pond will be pumped to the on-site wastewater treatment plant for all of the alternatives except No Action.
5. The location of the four DNAPL recovery wells on Figure 5-3 for Alternative 3 is different from the location of recovery wells for Alternative 4 on Figure 5-7. It is EPA's understanding that the number, as well as the location of DNAPL recovery wells, will be determined during the design stage.

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6. Soil consolidation on page 5-25 discusses in situ stabilization of surface soils for Alternative 3, whereas ex-situ stabilization is discussed further down the page. I am assuming that ex-situ stabilization will take place, prior to placement in the sedimentation basin.
7. Figure 5-3 identifies DNAPL recovery wells, but there is no discussion in the narrative on page 2-21 concerning DNAPL recovery.
8. Page 5-27 does not discuss the use of a silt fence as a component of the remedial alternative, but the fence is delineated on Figure 5-6.
9. The narrative on Page 5-45 under the heading soil removal states that the excavated soils will undergo in situ stabilization/solidification. It should state thermal treatment.
10. Remedial and/or additional investigative measures to address ground water contamination as a result of the pipeline investigation have not been addressed in the Final Feasibility Study. EPA will require that additional investigation be conducted and appropriate remedial action be initiated, if warranted, as part of the Remedial Design/Remedial Action.

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